

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ
 RICHARD F. ALBERT
 ROBERT J. ANELLO*
 KATHLEEN E. CASSIDY
 BENJAMIN S. FISCHER
 CATHERINE M. FOTI
 CHRISTOPHER B. HARWOOD
 LAWRENCE IASON.
 BRIAN A. JACOBS
 TELEMACHUS P. KASULIS
 KAREN R. KING
 ROBERT M. RADICK*
 JONATHAN S. SACK**
 EDWARD M. SPIRO
 JEREMY H. TEMKIN
 RICHARD D. WEINBERG

565 FIFTH AVENUE
 NEW YORK, NEW YORK 10017
 (212) 856-9600
 FAX: (212) 856-9494
www.maglaw.com

jtemkin@maglaw.com
 ralbert@maglaw.com
 (212) 856-9600

SENIOR COUNSEL
 PAUL R. GRAND

 COUNSEL
 JASMINE JUTEAU

 ROBERT G. MORVILLO
 1938-2011
 MICHAEL C. SILBERBERG
 1940-2002
 JOHN J. TIGUE, JR.
 1939-2009

* ALSO ADMITTED IN WASHINGTON, D.C.
 ** ALSO ADMITTED IN CONNECTICUT

VIA ECF

September 30, 2022

The Honorable Gregory H. Woods
 United States District Judge
 Southern District of New York
 Daniel Patrick Moynihan U.S. Courthouse
 500 Pearl Street
 New York, New York 10007-1312

MEMORANDUM ENDORSED

Re: United States v. Ivo Bechtiger, et al., 20 Cr. 497 (GHW)

Dear Judge Woods:

As your Honor is aware, this firm represents Daniel Wälchli, a defendant in the above-captioned matter. Pursuant to the schedule previously fixed by the Court, our pretrial motions are due today, September 30, 2022. Because our motion papers discuss and include as exhibits materials the government has designated as "Sensitive", the Protective Order entered in this case requires that we seek the government's consent before publicly filing them. *See* Dkt. No. 32. We have conferred with the government attorneys in this case and agreed that the most efficient process would be for us to serve unredacted versions of our motion papers today and allow the government attorneys to review those papers and propose any redactions they believe are necessary before the documents are publicly filed.

Accordingly, subject to the Court's approval, we intend to submit unredacted versions of our motion papers to the government and to the Court today via email.¹ The government has agreed to give us its view as to what materials, if any, they believe need to be filed under seal no later than Thursday, October 6, 2022. We will then promptly file our motion papers with any necessary redactions, or seek the Court's resolution of any disputes regarding what matters need to be filed under seal.

¹ Pursuant to Rule 2(A) of the Court's Individual Rules of Practice in Criminal Cases, we intend to email our papers to WoodsNYSDChambers@nysd.uscourts.gov as .pdf attachments.

MORVILLO ABRAMOWITZ GRAND JASON & ANELLO P.C.

Hon. Gregory H. Woods
September 30, 2022
Page 2

If the Court wishes, we are available to discuss this matter at the Court's convenience.

Respectfully submitted,

/s/ Jeremy H. Temkin

Jeremy H. Temkin
Richard F. Albert

cc: AUSA Olga Zverovich (by ECF)
SAUSA Nanette Davis (by ECF)
Christopher Magnani, Esq. (by ECF)

Application granted in part. Defendant should serve his pretrial motions on the United States today, September 30, 2022. He should not email them to the Court. Defendant should file his motion papers, with any redactions, no later than October 10, 2022, and must email unredacted versions of the submissions to the Court on the same day. Either the Government or Defendant must file on October 10, 2022 a letter motion to file under seal any materials that have been redacted from the public filing. Because the Government will be in receipt of the unredacted versions of Defendant's pretrial motions today, the other deadlines set in this case, Dkt. No. 39, are unchanged.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 42.

SO ORDERED.

Dated: September 30, 2022
New York, New York



GREGORY H. WOODS
United States District Judge